

**IN THE UNITED STATES DISTRICT COURT
FOR THE STATE OF DELAWARE**

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| KERRY JOHNSON and) | |
| SHARON ANDERSON,) | |
| on behalf of themselves and all) | |
| others similarly situated,) | |
|)) | |
| Plaintiffs,) C.A. No. 1:06-cv408 (JJF) | |
|)) | |
| v.)) | |
|)) | |
| GOVERNMENT EMPLOYEES) NON-ARBITRATION | |
| INSURANCE COMPANY,) | |
| GEICO CASUALTY COMPANY,) TRIAL-BY JURY DEMANDED | |
| GEICO GENERAL INSURANCE) | |
| COMPANY, and GEICO INDEMNITY) | |
| COMPANY,) CLASS ACTION | |
|)) | |
| Defendants.)) | |

NOTICE OF 30(B)(6) DEPOSITION

TO:

BY HAND DELIVERY

Dawn L. Becker, Esquire
Gary Alderson, Esquire
LAW OFFICES OF DAWN L. BECKER
Citizens Bank Center
919 Market Street, Suite 725
Wilmington, DE 19801

BY FIRST CLASS MAIL

George M. Church, Esquire
Laura A. Cellucci, Esquire
MILES & STOCKBRIDGE P.C.
10 Light Street
Baltimore, MD 21202

PLEASE TAKE NOTICE that pursuant to District Court Rule 30(b)(6), the Plaintiffs will take the deposition upon oral examination of the person designated by Defendants with respect to the topics set forth in Exhibit A. The deposition will take place on April 7, 2008, commencing at 10:00 a.m. at the offices of Miles & Stockbridge P.C., 10 Light Street, Baltimore, Maryland, or such other date or at such other time or place as may be agreed upon by the parties or ordered by the Court. The deposition will be recorded by stenographic means.

Dated: March 17, 2008
Wilmington, Delaware

CROSS & SIMON, LLC

By: RH S. M.

Richard H. Cross, Jr. (No. 3576)
Christopher P. Simon (No. 3697)
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Attorneys for Plaintiffs

EXHIBIT A

- How Defendants' Delaware PIP claims, as defined by 21 Del. C. § 2118B, ("PIP Claims") are processed.
- How Defendants' Delaware PIP coverage in Defendants' Delaware insurance policies are written.
- Who writes Defendants' Delaware PIP coverage in Defendants' Delaware insurance policies.
- How Defendants' Delaware PIP Claims are reviewed.
- How Defendants determine to reduce payments for Delaware PIP Claims submitted by their Delaware insureds.
- How Defendants determine what amounts are reasonable and necessary charges for PIP Claims submitted by their Delaware insureds.
- Knowledge of Defendants' Delaware PIP Claims (i.e. amounts submitted by Defendants' insureds in Delaware, the amount paid on Defendants' insureds claims, basis for reductions).
- How Defendants' claims adjustors are assigned to handle or process PIP Claims.
- How Defendants' claims adjustors are trained to handle or process PIP Claims.
- The number of Defendants' Delaware insureds for the period of June 26, 2001 to the present.
- The number of Defendants' Delaware insureds who filed PIP Claims for the period of June 26, 2001 to the present.
- The dollar amount of Defendants' insureds' PIP Claims submitted by Delaware insureds for the period of June 26, 2001 to the present. The witness should be prepared to provide information for each calendar year.
- The dollar amount of Defendants' insureds' PIP Claims paid in Delaware for the period of June 26, 2001 to the present. The witness should be prepared to provide information for each calendar year.
- How Defendants' Delaware PIP Claims are tracked.
- How determinations are made to cut off medical payments or reimbursements for Delaware PIP Claims submitted by Defendants' Delaware insureds.

- The time between when Delaware PIP claims were received by Defendants and when they were paid for the period of June 26, 2001 to the present.
- Defendants' "rules" applied to, or created for PIP Claims.
- Defendants' "management reports" prepared for Defendants' management to monitor or assess PIP Claims and cost containment measures relating to PIP Claims.
- The identity of any adjuster(s) responsible for Kerry Johnson's PIP file and, to the extent there is more than one, the periods of time and to which aspects each adjuster was responsible.
- The identity of any adjuster(s) responsible for Sharon Anderson's PIP file and, to the extent there is more than one, the periods of time and to which aspects each adjuster was responsible.
- The identity of any individual(s) who authorized payment and/or reimbursement of PIP claims for Kerry Johnson.
- The identity of any individual(s) who authorized payment and/or reimbursement of PIP claims for Sharon Anderson.